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## **ALLEN & OVERY**

## VIA ECF

The Honorable Mary Kay Vyskocil United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

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March 7, 2024

Re: United States v. Daivon Morgan, et al., S6 21 Cr. 570 (MKV)

Dear Judge Vyskocil:

We represent Daivon Morgan in the above-captioned matter and write to request a brief additional extension of time for Mr. Morgan to submit objections to the draft Pre-Sentence Investigation Report ("PSR"). The parties' objections to the draft PSR are currently due on Friday, March 8, 2024 (ECF No. 252).

We respectfully request that the Court grant an additional extension of time of 10 days, until Monday, March 18, 2024, for Mr. Morgan to have sufficient time at the Metropolitan Detention Center to carefully review and submit any objections to the draft PSR. We conferred with AUSA Courtney Heavey and she does not object to this request. We also inquired by email with USPO Simone Belgrave but have not heard back as of the time of this filing. In addition, we request that the Court also grant an extension of time for the second PSR disclosure by the U.S. Pretrial Office, which is currently due on March 18, 2024, to March 28, 2024.

Respectfully submitted,

ALLEN & OVERY LLP

By: /s/ Eugene Ingoglia
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CC:

AUSA Courtney Heavey (courtney.heavey@usdoj.gov)
USPO Simone B. Belgrave (simone\_belgrave@nysp.uscourts.gov)

**Granted. SO ORDERED.** 

Date: <u>3/8/2024</u>

New York, New York

| Mary Kay Vo